

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO, EASTERN DIVISION**

MENG HUANG,

Plaintiff,

v.

THE OHIO STATE UNIVERSITY and  
GIORGIO RIZZONI,

Defendants.

Case No: 2:19-cv-1976

Judge James L. Graham

Magistrate Judge: Chelsey M. Vascura

Jury Trial Demanded

**PLAINTIFF'S THIRD SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS  
DIRECTED TO DEFENDANT THE OHIO STATE UNIVERSITY**

**GENERAL INSTRUCTIONS**

1. Plaintiff, Meng Huang, through her undersigned counsel, pursuant to Rule 34 of the Federal Rules of Civil Procedure, requests that Defendant the Ohio State permit Plaintiff to inspect and to copy the documents requested in its Second Request for Production of Documents within thirty (30) days of service hereof.

2. In responding to these Discovery Requests, you are requested to furnish all information, items and documents known or available to you regardless of whether such information, items and documents are directly in your possession or that of your agents, representatives or experts.

3. If any requested document or item is no longer in your possession, custody or control, then you must state the following:

- (a) What was done with the document or item;
- (b) When such document or item was created;

- (c) The identity and address of the current custodian;
- (d) The reasons for transfer or disposal; and
- (e) The identity and address of the person who decided to transfer or dispose of the document or item.

4. You shall respond to these Discovery Requests fully and completely.

5. These Discovery Requests shall be deemed continuing in nature, so as to require supplemental responses and production if you or anyone on your behalf obtains additional information, items and/or documents, or if additional information, items and/or documents become available to you, between the time the responses are served and the termination of any trial on the matters in this action.

6. If anything has been deleted or redacted from a document produced in response to these Discovery Requests, then you must state the following in your response:

- (a) Specify the nature of the material deleted or redacted;
- (b) Specify the reason for the deletion or redaction; and
- (c) Identify the person responsible for the deletion or redaction.

7. If objection is made to responding to any request, or any portion thereof, or to disclosing any information contained therein, on the basis of any claim of privilege, you must specify in your response the nature of such information, items or documents, along with the nature of the privilege claimed, so that the Court may rule on the propriety of the objection. Specifically, you should state the following:

- (a) The title of the document or item;
- (b) The nature of the document or item;
- (c) The author or sender;
- (d) The addressee;
- (e) The date of the document or item;

- (f) The name of each person to whom the original or a copy was shown or circulated;
- (g) The name(s) appearing on any circulation list relating to the document or item;
- (h) The basis upon which privilege is claimed; and
- (i) A summary statement of the subject matter of the document or item in sufficient detail to permit the court to rule on the propriety of the objection.

A privilege log, as detailed above, shall be served no later than thirty (30) days from issuance of these Discovery Requests.

8. Documents and items should be produced with an appropriate indication as to the paragraph under which they are being produced, meaning the response or answer should designate specifically which documents are responsive to that Request, including identifying the applicable bates stamp numbers.

9. Documents are to be produced with sequential and unique Bates labeling, except where such labeling is impracticable because the document comprises electronically stored information being produced in native form.

### **DEFINITIONS**

The following definitions apply to these Discovery Requests.

1. “You,” “your,” or “Defendant” means Defendant the Ohio State University (“OSU”), and its present or former officers, trustees, directors, agents, attorneys, employees and representatives.

2. “Huang” or “Plaintiff” shall mean Plaintiff Meng Huang.

3. “ESI” shall mean any Electronically Stored Information.

4. The terms “Action” or “Proceeding” mean this proceeding, as captioned above.

5. The term “Personnel File” as used herein is to be construed broadly and shall mean applications for employment, evaluations, awards and the like, commonly kept in some central

place and called by that name or something similar, but also all other documents concerning or primarily concerning the person referred to, regardless of where kept and regardless of by whom prepared, including all applications for employment, resumes, attendance records, employee calendars, tests, performance appraisals, awards, documents reflecting job performance and/or employee conduct, letters of commendation, reprimands, letters of termination, investigative files and reports concerning or substantially concerning the person identified whether or not they actually are contained in the personnel file.

13. The terms “and” and “or” shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these document requests information or documents which might otherwise be considered to beyond their scope.

#### **REQUESTS FOR PRODUCTION OF DOCUMENTS**

25. Produce the complete personnel files of Jonathan Parry.

#### **ANSWER:**

26. Produce the complete personnel files of Kristi Hoge.

#### **ANSWER:**

Date: June 16, 2020

/s/Bruce C. Fox

Bruce. C. Fox (PA 42576)

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### **CERTIFICATE OF SERVICE**

I hereby certify that on June 16, 2020, a copy of the foregoing Third Request for Production of Documents Directed to Defendant the Ohio State University was served via electronic mail to the following recipients:

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/s/Qiwei Chen